

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington  
September 9, 2020

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WILLIAM M. McCOOL, Clerk  
By John J. McCool Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

CASE NO. CR20-146 JCC

Plaintiff,

Y.

JESUS DANIEL LERMA-JARAS, and

## INDICTMENT

LIONEL GONZALEZ-TORRES,

## Defendants.

The Grand Jury charges that:

## COUNT 1

## Conspiracy to Distribute Heroin and Methamphetamine

Beginning on a date unknown, but within the last five years, and continuing until on or about February 13, 2020, in King, Snohomish, and Skagit Counties, within the Western District of Washington, and elsewhere, JESUS DANIEL LERMA-JARAS, LIONEL GONZALEZ-TORRES, and others known and unknown, did knowingly and intentionally conspire to distribute controlled substances, including methamphetamine and heroin, substances controlled under Title 21, United States Code, Section 812, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 846.

The Grand Jury further alleges that with respect to JESUS DANIEL LERMA-JARAS and LIONEL GONZALEZ-TORRES, their conduct as members of the

## INDICTMENT

United States v. Lerma-Jaras, et al. - 1

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1 conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of  
2 other members of the conspiracy charged in Count 1, involved 50 grams or more of  
3 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a  
4 mixture or substance containing a detectable amount of methamphetamine, its salts,  
5 isomers, or salts of its isomers, in violation of Title 21, United States Code, Section  
6 841(b)(1)(A).

7 The Grand Jury further alleges that with respect to JESUS DANIEL LERMA-  
8 JARAS and LIONEL GONZALEZ-TORRES, their conduct as members of the  
9 conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of  
10 other members of the conspiracy charged in Count 1, involved 1,000 grams or more of a  
11 mixture or substance containing a detectable amount of heroin, in violation of Title 21,  
12 United States Code, Section 841(b)(1)(A).

13 All in violation of Title 21, United States Code, Section 846.

14

15 **COUNT 2**  
16 **Distribution of Heroin**

17 On or about October 25, 2018, in Snohomish County, within the Western District  
18 of Washington, JESUS DANIEL LERMA-JARAS and LIONEL GONZALEZ-TORRES  
19 did knowingly and intentionally distribute, and aid and abet the distribution of, a  
20 controlled substance, to wit: heroin, a substance controlled under Title 21, United States  
21 Code.

22 The Grand Jury further alleges that this offense was committed during and in  
23 furtherance of the offense alleged in Count 1 (conspiracy).

24 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
25 841(b)(1)(C), and Title 18, United States Code, Section 2.

## **COUNT 3**

### **Distribution of Heroin**

On or about November 2, 2018, in Snohomish County, within the Western District of Washington, JESUS DANIEL LERMA-JARAS did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, to wit: heroin, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (conspiracy).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

## COUNT 4

### Distribution of Methamphetamine

On or about November 6, 2018, in Snohomish County, within the Western District of Washington, JESUS DANIEL LERMA-JARAS did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, to wit: methamphetamine, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense involved 5 grams or more of methamphetamine, its salts, isomers, or salts of its isomers.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (conspiracy).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT 5**

**Possession of Heroin with Intent to Distribute**

On or about November 27, 2018, in Snohomish County, within the Western District of Washington, JESUS DANIEL LERMA-JARAS did knowingly and

1 intentionally possess, with the intent to distribute, and aid and abet the possession of with  
2 the intent to distribute, controlled substances, to wit: heroin, a substance controlled under  
3 Title 21, United States Code.

4 The Grand Jury further alleges that this offense involved 100 grams or more of a  
5 mixture or substance containing a detectable amount of heroin.

6 The Grand Jury further alleges that this offense was committed during and in  
7 furtherance of the offense alleged in Count 1 (conspiracy).

8 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
9 841(b)(1)(B), and Title 18, United States Code, Section 2.

10

11 **COUNT 6**  
12 **Possession of a Stolen Firearm**

13 On or about November 27, 2018, in Snohomish County, within the Western  
14 District of Washington, JESUS DANIEL LERMA-JARAS did knowingly possess the  
15 following three stolen firearms, to wit: (1) a Smith & Wesson, model SD9VE, 9mm  
16 semiautomatic pistol bearing serial number FYS8056, (2) a Glock, model 43, 9mm  
17 semiautomatic pistol bearing serial number BCTL543, and (3) a Glock, model 23, .40  
18 caliber semiautomatic pistol bearing serial number BDNR061, all of which had been  
19 shipped and transported in interstate and foreign commerce, knowing and having  
20 reasonable cause to believe the firearms were stolen.

21 All in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

22

23 **COUNT 7**  
24 **Distribution of Heroin and Methamphetamine**

25 On or about May 29, 2019, in Snohomish County, within the Western District of  
26 Washington, LIONEL GONZALEZ-TORRES did knowingly and intentionally  
27 distribute, and aid and abet the distribution of, controlled substances, to wit: heroin and  
28 methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense involved 5 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, and 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

The Grand Jury further alleges that this offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (conspiracy).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

## COUNT 8

### Distribution of Heroin and Methamphetamine

On or about June 12, 2019, in Snohomish County, within the Western District of Washington, LIONEL GONZALEZ-TORRES did knowingly and intentionally distribute, and aid and abet the distribution of, controlled substances, to wit: heroin and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense involved 5 grams or more of methamphetamine, its salts, isomers, or salts of its isomers.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (conspiracy).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and (C), and Title 18, United States Code, Section 2.

**COUNT 9**

On or about June 20, 2019, in Snohomish and Skagit Counties, within the Western District of Washington, LIONEL GONZALEZ-TORRES did knowingly and

1 intentionally possess, with the intent to distribute, and aid and abet the possession of with  
2 the intent to distribute, controlled substances, to wit: methamphetamine and heroin,  
3 substances controlled under Title 21, United States Code.

4 The Grand Jury further alleges that this offense involved 50 grams or more of  
5 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a  
6 mixture or substance containing a detectable amount of methamphetamine, its salts,  
7 isomers, or salts of its isomers.

8 The Grand Jury further alleges that this offense involved 100 grams or more of a  
9 mixture or substance containing a detectable amount of heroin.

10 The Grand Jury further alleges that this offense was committed during and in  
11 furtherance of the offense alleged in Count 1 (conspiracy).

12 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
13 841(b)(1)(A) and (B), and Title 18, United States Code, Section 2.

14

15 **COUNT 10**  
16 **Distribution of Heroin and Methamphetamine**

17 On or about July 31, 2019, in King County, within the Western District of  
18 Washington, JESUS DANIEL LERMA-JARAS and LIONEL GONZALEZ-TORRES  
19 did knowingly and intentionally distribute, and aid and abet the distribution of,  
20 controlled substances, to wit: methamphetamine and heroin, substances controlled under  
21 Title 21, United States Code.

22 The Grand Jury further alleges that this offense involved 5 grams or more of  
23 methamphetamine, its salts, isomers, or salts of its isomers.

24 The Grand Jury further alleges that this offense was committed during and in  
25 furtherance of the offense alleged in Count 1 (conspiracy).

26 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
27 841(b)(1)(B) and (C), and Title 18, United States Code, Section 2.

**COUNT 11**  
**Distribution of Heroin**

On or about February 13, 2020, in King County, within the Western District of Washington, JESUS DANIEL LERMA-JARAS and LIONEL GONZALEZ-TORRES did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, to wit: heroin, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (conspiracy).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT 12**  
**Possession of Heroin with Intent to Distribute**

On or about September 1, 2020, in Skagit County, within the Western District of Washington, LIONEL GONZALEZ-TORRES did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of with the intent to distribute, controlled substances, to wit: methamphetamine and heroin, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense involved 1,000 grams or more of a mixture or substance containing a detectable amount of heroin.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (conspiracy).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

## ASSET FORFEITURE ALLEGATIONS

All of the allegations contained in this Indictment are realleged and incorporated by reference for the purpose of alleging forfeiture.

### Count 1

# Conspiracy to Distribute Heroin and Methamphetamine

Upon conviction of the offense alleged in Count 1, the defendants JESUS DANIEL LERMA-JARAS and LIONEL GONZALEZ-TORRES shall each forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to:

- a. \$7,540 in U.S. currency that was seized from LIONEL GONZALEZ-TORRES in Burlington, Washington on June 20, 2019; and,
- b. Sums of money reflecting the proceeds each defendant obtained from the offense.

## Count 2

## Distribution of Heroin

Upon conviction of the offense alleged in Count 2, the defendants JESUS DANIEL LERMA-JARAS and LIONEL GONZALEZ-TORRES shall each forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to sums of money reflecting the proceeds each defendant obtained from the offense.

### Count 3

## Distribution of Heroin

Upon conviction of the offense alleged in Count 3, the defendant JESUS DANIEL LERMA-JARAS shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not

1 limited to a sum of money reflecting the proceeds the defendant obtained from the  
2 offense.

3 **Count 4**  
4 **Distribution of Methamphetamine**

5 Upon conviction of the offense alleged in Count 4, the defendant JESUS DANIEL  
6 LERMA-JARAS shall forfeit to the United States, pursuant to Title 21, United States  
7 Code, Section 853, any property that constitutes or is traceable to proceeds of the offense,  
8 as well as any property that facilitated the offense. This property includes, but is not  
9 limited to a sum of money reflecting the proceeds the defendant obtained from the  
10 offense.

11 **Count 5**  
12 **Possession of Heroin with Intent to Distribute**

13 Upon conviction of the offense alleged in Count 5, the defendant JESUS DANIEL  
14 LERMA-JARAS shall forfeit to the United States, pursuant to Title 21, United States  
15 Code, Section 853, any property that constitutes or is traceable to proceeds of the offense,  
16 as well as any property that facilitated the offense.

17 **Count 6**  
18 **Possession of a Stolen Firearm**

19 Upon conviction of the offense alleged in Count 6, the defendant JESUS DANIEL  
20 LERMA-JARAS shall forfeit to the United States, pursuant to Title 18, United States  
21 Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any  
22 firearms and associated ammunition that were involved in the offense.

23 **Count 7**  
24 **Distribution of Heroin and Methamphetamine**

25 Upon conviction of the offense alleged in Count 7, the defendant LIONEL  
26 GONZALEZ-TORRES shall forfeit to the United States, pursuant to Title 21, United  
27 States Code, Section 853, any property that constitutes or is traceable to proceeds of the  
28 offense, as well as any property that facilitated the offense. This property includes, but is  
not limited to a sum of money reflecting the proceeds the defendant obtained from the  
offense.

## Count 8

## **Distribution of Heroin and Methamphetamine**

Upon conviction of the offense alleged in Count 8, the defendant LIONEL GONZALEZ-TORRES shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to a sum of money reflecting the proceeds the defendant obtained from the offense.

## Count 9

## **Possession of Heroin and Methamphetamine with Intent to Distribute**

Upon conviction of the offense alleged in Count 9, the defendant LIONEL GONZALEZ-TORRES shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

## Count 10

## Distribution of Heroin

Upon conviction of the offense alleged in Count 10, the defendants JESUS DANIEL LERMA-JARAS and LIONEL GONZALEZ-TORRES shall each forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to sums of money reflecting the proceeds each defendant obtained from the offense.

## Count 11

## Distribution of Heroin

Upon conviction of the offense alleged in Count 11, the defendants JESUS DANIEL LERMA-JARAS and LIONEL GONZALEZ-TORRES shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to a sum of money reflecting the proceeds the defendant obtained from the offense.

**Count 12**  
**Possession of Heroin with Intent to Distribute**

Upon conviction of the offense alleged in Count 12, the defendant LIONEL GONZALEZ-TORRES shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

**Substitute Assets.** If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court;
- c. has been substantially diminished in value; or,

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1       d.    has been commingled with other property which cannot be divided without  
2       difficulty,

3   it is the intent of the United States to seek the forfeiture of any other property of the  
4   defendant, up to the value of the above-described forfeitable property, pursuant to Title  
5   21, United States Code, Section 853(p).

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7                   A TRUE BILL:

8                   DATED: *September 9, 2020*

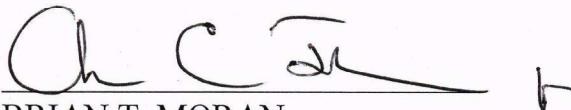
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10                   *(Signature of Foreperson redacted  
11                   pursuant to the policy of the Judicial  
12                   Conference of the United States)*

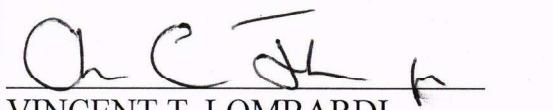
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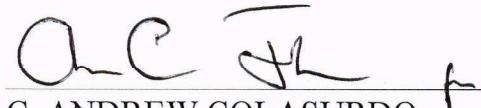
FOREPERSON

14                     
15                   BRIAN T. MORAN

16                   United States Attorney

17                     
18                   VINCENT T. LOMBARDI

19                   Assistant United States Attorney

20                     
21                   C. ANDREW COLASURDO

22                   Assistant United States Attorney

23                     
24                   STEVEN HOBBS

25                   Assistant United States Attorney